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March 21, 2014

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HAND DELIVERED

Jeff R. Derouen
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602-0615

RECEIVED
MAR 21 2014
PUBLIC SERVICE
COMMISSION

RE: Case No. 2013-00475

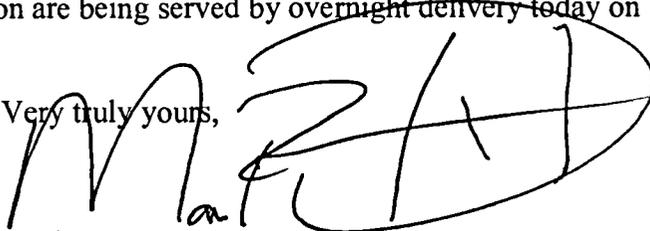
Dear Mr. Derouen:

Enclosed please find and accept for filing the original and ten copies of the Company's responses to Staff's March 7, 2014 data requests, and the Company's public responses to Sierra Club's March 7, 2014 data requests.

Also enclosed is the Company's motion for confidential treatment and attached confidential portions of the Company's responses to Sierra Club data request SC 2-10. Also enclosed and appropriately highlighted are the unredacted version of Sierra Club Data Requests SC 2-1, SC 2-2, SC 2-6, and SC 2-10 containing confidential information and redacted by Sierra Club in the public version of its second set of data requests.

Copies of the responses and the motion are being served by overnight delivery today on the persons listed below.

Very truly yours,


Mark R. Overstreet

MRO

cc: Michael L. Kurtz
Kristin Henry
Shannon Fisk
Joe F. Childers

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
MAR 21 2014
PUBLIC SERVICE
COMMISSION

In the Matter of:

INTEGRATED RESOURCE PLANNING REPORT)
OF KENTUCKY POWER COMPANY TO THE)
KENTUCKY PUBLIC SERVICE COMMISSION,) CASE NO. 2013-00475
DECEMBER 20, 2013)

* * * * *

MOTION OF KENTUCKY POWER COMPANY
FOR CONFIDENTIAL TREATMENT

Kentucky Power Company (“Kentucky Power” or “Company”) moves the Commission pursuant to 807 KAR 5:001, Section 13(2), for an Order granting confidential treatment for portions of its answer to Sierra Club Data Request SC 2-10 and Attachment 1 thereto. In addition, Kentucky Power seeks confidential treatment for those portions of Sierra Club Data Requests SC 2-1, SC 2-2, SC 2-6, and SC 2-10 containing confidential information and redacted by Sierra Club in the public version of its second set of data requests.

Pursuant to 807 KAR 5:001, Section 13, Kentucky Power is filing under seal, with the confidential portions highlighted in yellow, those portions of its answer to Sierra Club Data Request SC 2-10 and of Attachment 1 thereto. In addition, it is filing under seal Sierra Club Data Requests SC 2-1, SC 2-2, SC 2-6, and SC 2-10 in their entirety, with the confidential portions highlighted in yellow.

Kentucky Power is also filing ten copies of the redacted version of the data requests and response for which confidential treatment is being sought. Kentucky Power will notify the

Commission when it determines the information for which confidential treatment is sought is no longer confidential. In support of its motion, Kentucky Power states as follows.

A. The Requests and the Statutory Standard.

The identified portions are required to be excluded from the public record and public disclosure. KRS 61.878(1)(c)(1) excludes from the Open Records Act:

"[r]ecords confidentially disclosed to an agency or required by an agency to be disclosed to it, generally recognized as confidential or proprietary, which if openly disclosed would present an unfair commercial advantage to competitors of the entity that disclosed the records.

This exception applies to the following information for which Kentucky Power is seeking confidential treatment:

(a) Kentucky Power's Response to Sierra Club Data Request SC 2-10.

Kentucky Power seeks confidential treatment of the identified information in its answer to Sierra Club Data Request SC 2-10 and in Attachment 1 thereto. Kentucky Power's answer and Attachment 1 include information regarding Kentucky Power's evaluations of its decision of whether to participate in the PJM market as a FRR or RPM entity for the 2017/2018 planning year. Kentucky Power's participation as an FRR or RPM entity, and its exact UCAP position can help the Company's competitors determine their offer price and capacity amount strategies in the 2017-2018 planning year Base Residual Auction. Public disclosure of this information could change the bidding strategies of those participating as RPM entities. For example, these entities could make higher or lower offers or change the quantity offered creating either unduly high, or unduly low clearing prices for the 2017/2018 planning year Base Residual Auction. As the clearing price increases, AEP's financial position also improves, potentially reducing borrowing costs. A financially stronger AEP can also better position the Company with its

suppliers, potentially creating opportunities for lower procurement costs with benefits flowing to all operating companies including Kentucky Power.

Kentucky Power seeks confidential treatment of the identified information in its answer to Sierra Club Data Request SC 2-10 and in Attachment 1 thereto until the close of the Base Residual Auction for the 2017/2018 planning year on May 16, 2014 at 5:00 PM Columbus, Ohio prevailing time.

(b) Sierra Club Data Requests SC 2-1, SC 2-2, SC 2-6, and SC 2-10.

Kentucky Power also seeks confidential treatment of the identified portions of Sierra Club Data Requests SC 2-1, SC 2-2, SC 2-6, and SC 2-10. The identified portions of these data requests divulge information obtained from confidential attachments filed in response to the Sierra Club's first set of data requests in this case and that was redacted from the public versions of the data requests filed by Sierra Club. Sierra Club Data Requests SC 2-1 and SC 2-2 contain information provided by Kentucky Power in Confidential Attachment 4 to the Company's response to Sierra Club Data Request SC 1-2. Sierra Club Data Request SC 2-6 contains information provided in Confidential Attachment 1 to Sierra Club Data Request 1-14, and Sierra Club Data Request SC 2-10 contains information provided in Confidential Attachment 2 to the Company's response to Sierra Club Data Request SC 1-24.

On February 20, 2014, Kentucky Power filed a motion seeking confidential treatment of the information referenced in Sierra Club Data Requests SC 2-1, SC 2-2, SC 2-6, and SC 2-10. That motion remains pending. Kentucky Power incorporates the bases for its February 20, 2014 motion into this motion.

B. The Identified Information is Generally Recognized As Confidential and Proprietary and Public Disclosure Of It Will Result In An Unfair Commercial Advantage or Will Threaten the Public Safety.

The identified information required to be disclosed by Kentucky Power in response to Sierra Club Data Request SC 2-10 and included by Sierra Club in Sierra Club Data Requests SC 2-1, SC 2-2, SC 2-6, and SC 2-10 is confidential and not generally known or readily ascertainable by other parties through normal or proper means. No reasonable amount of legitimate independent research could yield this confidential information to other parties. Dissemination of the information for which confidential treatment is being requested is restricted by Kentucky Power, its affiliated operating companies, AEP, and AEPSC (the “AEP Entities”). The AEP Entities take all reasonable measures to prevent its disclosure to the public as well as persons within the AEP Entities who do not have a need for the information. The information is not disclosed to persons outside the AEP Entities. Within those organizations, the information is available only upon a confidential need-to-know basis that does not extend beyond those employees with a legitimate business need to know and act upon the identified information.

C. The Identified Information Is Required To Be Disclosed To An Agency.

The identified information is by the terms of the Commission’s Order required to be disclosed to the Commission. The Commission is a “public agency” as that term is defined at KRS 61.870(1). Any filing should be subject to a confidentiality order and any party requesting such information should be required to enter into an appropriate confidentiality agreement.

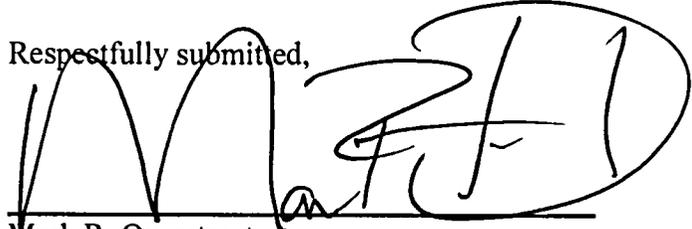
WHEREFORE, Kentucky Power Company respectfully requests the Commission to enter an Order:

1. According confidential status to and withholding from public inspection the identified portions of its answer to Sierra Club Data Request SC 2-10 and Attachment I thereto.

2. According confidential status to and withholding from public inspection the identified portions of Sierra Club Data Requests SC 2-1, SC 2-2, SC 2-6, and SC 2-10.

3. Granting Kentucky Power all further relief to which it may be entitled.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M. Overstreet', is written over a horizontal line. To the right of the signature is a large, stylized circular mark containing the letters 'FH1'.

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COUNSEL FOR KENTUCKY POWER
COMPANY

CERTIFICATE OF SERVICE

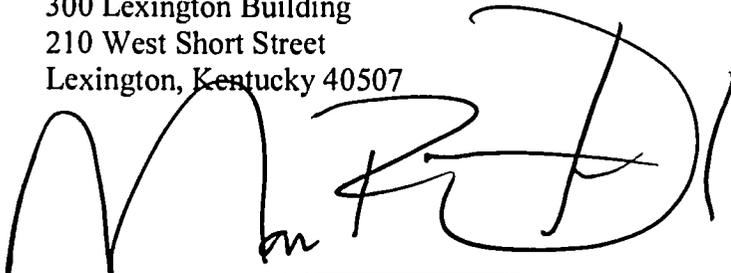
I hereby certify that a copy of the foregoing was served by overnight delivery, this 21st day of March, 2014.

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